## Remarks/Arguments

Claims 1-24 were pending in the application. In response to a restriction requirement of the Office Action dated Dec. 14, 2005, claims 1-10 were cancelled without prejudice to filing a divisional or continuation application with those canceled claims. Claims 11-12 are currently amended. Claims 13-24 are still pending in their original form.

The Examiner rejected claims 11-23 pursuant to 35 U.S.C. § 102(b) as being anticipated by Collings (U.S. Patent No. 5,188,871). Claims 11-14 and 16-23 were rejected pursuant to 35 U.S.C. § 102(b) as being anticipated by Ahlm, Jr. et al (U.S. Patent No. 3,001,887). The Examiner rejected claim 24 pursuant to 35 U.S.C. § 103(a) as being unpatentable over Collings in view of Kurrle (U.S. Patent No. 6,214,766). Claim 24 was also rejected pursuant to 35 U.S.C. § 103(a) as being unpatentable over Ahlm, Jr. in view of Kurrle.

#### INDEPENDENT CLAIM 11:

Amended claim 11 recites verifying the authenticity of a coupon by "providing a first material having a lower starch content than non-currency grade paper on or within the coupon." The Examiner asserts that because Collings discloses a verification method that comprises the same materials as recited in claim 11, it is inherent for the first material in Collings to have a lower starch content than non-currency grade paper.

Collings, however, teaches having starch and iodate present in the paper or applying starch and iodate to the paper, and then authenticating the paper by applying a chemical to react with the starch. Because Collings teaches adding starch to the first material, the first material in Collings does not inherently possess less starch content than non-currency paper as recited in claim 11. Thus, Collings teaches the opposite of the Examiner's alleged inherency.

Collings does not disclose each element of claim 11 and does not anticipate claim 11.

Accordingly, withdrawal of the rejection under 35 U.S.C. § 102(b) of claim 11 is respectfully requested.

The Examiner also rejected claim 11 as anticipated by Ahlm, Jr. Ahlm, Jr. teaches a process for authenticating papers or coupons by printing an invisible design on the surface of the document with colloidal silica, and then testing for authenticity by rendering the design visible via the application of various lactones. Ahlm, Jr. does not disclose the use of starch or iodine for marking and authenticating papers or coupons, nor does it teach marking coupons with starch-deficient materials. In fact, Ahlm, Jr. may use any starch content because it teaches increasing the level of colloidal silica and does not suggest any other material levels. Thus, Ahlm, Jr. does not have an inherently lower starch content than non-currency grade paper.

Ahlm, Jr. does not disclose each element of claim 11 and does not anticipate claim 11. Accordingly, withdrawal of the rejection under 35 U.S.C. § 102(b) of claim 11 is respectfully requested.

### **DEPENDENTS CLAIMS 12-19:**

Claims 12-19 depend on claim 11, so are allowable for the same reasons as claim 11.

Further, claim 15 is not anticipated. Claim 15 recites using a currency counterfeit detection pen as the chemical applied to detect authenticity. Collings merely teaches the use of an acidic solution containing an iodide salt as the marking chemical (col. 3, lines 11-35).

Claim 16 is not anticipated. Claim 16 recites that the *absence* of a reaction between the marking chemical and a coupon lacking trace chemical residuals indicates authenticity. Collings teaches that the *presence* of a reaction between the chemical and the starch in the paper indicates authenticity (col. 2 lines 26-44). Ahlm, Jr. also relies on the presence of a reaction (col. 2, lines 49-59).

Claim 17 is not anticipated. Claim 17 recites that authenticity is established by a resulting light mark. Collings teaches that a dark coloration indicates authenticity (col. 2 lines 42-44, col. 3 lines 15-34). Ahlm, Jr. teaches creation of color for authenticity and no color for non-authentic papers (col. 2, lines 49-59; col. 3, lines 27-48).

Claim 18 is not anticipated. Claim 18 recites applying a coating that has substantially no trace chemical residuals. Collings teaches applying a coating that contains quantities of starch, a trace chemical residual (col. 3 lines 11-34). Ahlm, Jr. teaches applying a coating that contains

colloidal silica, *i.e.*, a coating that contains trace chemical residuals (col. 1, lines 50-55; col. 4 lines 50-75).

#### **INDEPENDENT CLAIM 20:**

Claim 20 recites manufacturing coupons that can be authenticated by printing a coupon and then adding to the coupon a material that is substantially free of trace chemical residuals so that the coupon reacts differently to a marking chemical than does a coupon that contains trace chemical residuals.

Collings teaches the converse, adding starch and iodate salts, *i.e.* trace chemical residuals, to the coupon so that "authentic" coupons containing starch and iodate salts will react differently than those without those added chemical residuals. Collings does not disclose each element of claim 20 and does not anticipate claim 20. Accordingly, withdrawal of the rejection under 35 U.S.C. § 102(b) of claim 20 is respectfully requested.

Ahlm, Jr. teaches the converse as well, using a lactone to mark or indicate the presence of colloidal silica, *i.e.* trace chemical residuals, for determining authenticity. Ahlm, Jr. does not disclose each element of claim 20 and does not anticipate claim 20. Accordingly, withdrawal of the rejection under 35 U.S.C. § 102(b) of claim 20 is respectfully requested.

#### **DEPENDENT CLAIMS 21-23:**

Because claims 21-23 all depend on claim 20, they are allowable for the same reasons as claim 20.

Claim 21 is not anticipated. Claim 21 recites coating the coupon with a material substantially free of starch. Collings teaches adding a first material that contains starch (col. 2 lines 30-44). Ahlm, Jr. does not mention starch at all.

# **DEPENDENT CLAIM 24:**

Claim 24 is allowable for the same reasons as independent claim 20. Claim 24 recites performing the method in claim 20 using a flexo device to coat the coupon with residual-deficient material. The Examiner relies on Kurrle for the teaching of flexography to apply

residual deficient material. Kurrle teaches printing authenticating solutions of starch on the surface of paper in selected patterns or images. Both Collings and Kurrle deal with authenticating papers via the use of added starch. Claim 24, however, recites using flexography to apply material that is deficient in trace chemical residuals, particularly material that lacks, or substantially lacks, any starch. Thus, Collings in light of Kurrle does not suggest the use of flexography to apply a trace-residual-deficient material to paper.

Ahlm, Jr. teaches applying colloidal silica to paper for authentication purposes. Kurrle teaches applying starch to the surfaces of paper in selected patterns or images through printing processes. Both Ahlm, Jr. and Kurrle references deal with wholly different chemicals, *i.e.*, the use of colloidal silica versus the use of starch. Viewing Ahlm, Jr. in light of Kurrle, a person of ordinary skill in the art would not be motivated to use flexography to coat a coupon with materials lacking trace chemical residuals.

A person of ordinary skill would not have combined Collings or Ahlm, Jr. with Kurrle to use flexography to apply trace-residual-deficient material to coupons. Therefore, withdrawal of the rejection under 35 U.S.C. § 103(a) of claim 24 is respectfully requested.

# **CONCLUSION**

In view of the remarks, the Applicant respectfully submits that the pending claims are in condition for allowance. If any issues remain, it is requested that the Examiner call the undersigned at (312) 321-4726 so that an interview can be arranged.

Respectfully submitted,

Craig A. Summerfield

Registration No. 37,947

Cey/eard

Attorney for Applicant

BRINKS HOFER GILSON & LIONE P.O. Box 10395 Chicago, Illinois 60610 (312) 321-4200 Dated: June 30, 2006